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## 5.8 - Land Use and Planning

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### 5.8.1 - Introduction

This section describes the existing land use and planning setting and the potential effects from project implementation on the site and its surrounding area. Descriptions and analysis in this section are based on information contained in the following reference documents:

- Newport Beach General Plan, Land Use Element
- Newport Beach General Plan, Recreation Element
- Newport Beach General Plan, Harbor and Bay Element
- Newport Beach General Plan, Natural Resources Element
- Newport Beach General Plan, Noise Element
- Newport Beach General Plan, Housing Element
- Local Coastal Program (LCP) Coastal Land Use Plan
- City of Newport Beach Municipal Code
- City of Newport Beach, City Council Policy H-1, Harbor Permit Policy

### 5.8.2 - Existing Conditions

The existing site encompasses 10.45 acres and is built up in nature with residential (i.e., mobile homes), Girls Scout house, community service (e.g., community center, public tennis courts, beach access, etc.), and surface parking lot uses. The 10.45-acre site is bordered on the east by an asphalt parking lot, the American Legion Post 291, residential and commercial uses, and 15<sup>th</sup> Street; to the south by West Balboa Boulevard and residential uses; and to the west by 18<sup>th</sup> Street, a hotel and residential uses, and 19<sup>th</sup> Street along the public beach.

#### Onsite Land Uses

The project site comprises of the Marina Park mobile home park, a public beach, Las Arenas Park, a community center, Girl Scout house, parking, Veteran's Park, and public restrooms. The Marina Park mobile home park is an approximately 50-year-old facility with approximately 15 full-time residents and 41 part-time tenants. The public beach is located between the Post 291 Yachting Club and 19<sup>th</sup> Street. Las Arenas Park consists of four public tennis courts and a children's play area. The City of Newport Beach Balboa Community Center and the Neva B. Thomas Girl Scout House are located along Balboa Boulevard. A metered public parking lot with 21 stalls is located adjacent to 18<sup>th</sup> Street. Veteran's Park includes a turf area with picnic tables located adjacent to the American Legion Post 291. Finally, the existing public restroom on the public beach at 19th street is also part of the project site.

## Surrounding Land Uses

Generally, the northern boundary of the project site is a portion of the public beach and Newport Bay. Immediately east of the project site is utilized as an asphalt parking lot, the American Legion Post 291, which can support up to 46 boat slips, 15<sup>th</sup> Street, and residential and commercial uses.

The area south of the project site is bordered by West Balboa Boulevard and residential uses.

The area west of the project site is occupied by 18<sup>th</sup> Street, a hotel, residential uses, and 19<sup>th</sup> Street along the public beach.

## Planning

Several local and regional plans, programs, and ordinances apply to or relate to the project site. They are the City's General Plan and Municipal Code and the Local Coastal Program (LCP) Coastal Land Use Plan.

### ***City of Newport Beach General Plan***

State law requires cities and counties, as political subdivisions of the State, to adopt general plans that provide a comprehensive set of policies and guidelines that are the basis for land-use decisions. In conformance with State planning law, general plans are required to contain the following elements: Land Use, Circulation, Conservation, Open Space, Noise, Safety, and Housing. The City of Newport Beach has also adopted the following optional elements to its General Plan: Historical Resources, Arts and Cultural, Harbor and Bay, and Recreation. The City's General Plan Update was approved by the City Council on July 25, 2006, and approved by voters on November 7, 2006.

Based on a review of the project location, components of the proposed project, technical studies prepared for the project, and the applicable policies of the General Plan Elements, the following elements have been determined to be applicable to the proposed project: Land Use, Recreation, Harbor and Bay, Natural Resources, Noise, Housing, Circulation, and Safety. Discussions of the applicable goals and policies of each element to the proposed project and the consistency of the project with the applicable goals and policies are provided in Section 5.8.4.

***Land Use Element.*** The land use element provides guidance regarding the ultimate pattern of development of Newport Beach at buildout. It is based on and correlates the policies from all elements into a set of coherent development policies, which serve as the central organizing element of the City's General Plan as a whole. Cumulatively, the Land Use Element's policies directly affect the establishment and maintenance of the neighborhoods, districts, corridors, and open spaces that distinguish and contribute to Newport Beach's livability, vitality, and image. Policies related to urban form are also contained in the Land Use Element.

The Land Use Element of the City's General Plan designates the project site as Park and Recreation (PR) and Public Facilities (PF). The PR designation applies to land used or proposed for active public or private recreational use. Permitted uses include parks (both active and passive), golf

courses, marina support facilities, aquatic facilities, tennis clubs and courts, private recreation, and similar facilities. The existing Marina Park mobile home park is not a permitted use on the project site. The existing public beach, Las Arenas Park, the community center, Girl Scout house, parking, Veteran's Park, and public restrooms are permitted uses on the project site.

The PF designation is intended to provide public facilities, including public schools, cultural institutions, government facilities, libraries, community centers, public hospitals, and public utilities. The portion of the project site that includes a PF designation is currently vacant and historically was used as a Southern California Edison substation.

**Recreation Element.** The City's parks, bicycle and pedestrian trails, recreational facilities, and coastal resources such as beaches play an important role in the physical, mental, social, and environmental health of Newport Beach residents. These facilities are important land-use components in an urban environment, providing both visual relief from the built environment and contributing to residents' quality of life through recreation and aesthetic value.

California State law requires that recreational issues be discussed in the General Plan. Since 1973, Newport Beach has had a Recreation and Open Space Element that was most recently amended in 1998. With the update of this General Plan, only policies related to recreation are included within this element, while open-space policies are contained within the Natural Resources Element.

The primary purpose of the Recreation Element is to ensure that the balance between the provision of sufficient parks and recreation facilities is appropriate for the residential and business population of Newport Beach. Specific recreational issues and policies contained in the Recreation Element include the following: parks and recreation facilities, recreation programs, shared facilities, coastal recreation and support facilities, marine recreation, and public access.

The City has been divided into service areas for the purposes of park planning and to equitably administer parkland dedications and fees provided by residential development. The project site is located in Service Area No. 2 - Balboa Peninsula. Like West Newport, most of the Peninsula's recreation area is in beaches. This area has little vacant land for development, and the population is expected to remain stable. Although there is currently a surplus in park acreage, any future park needs can be satisfied via the renovation and upgrading of facilities, such as those at Las Arenas Park and Peninsula Park. Additional active park facilities are desirable, along with support facilities such as restrooms, showers, and drinking fountains. There is also a need for additional boat launching and mooring facilities, as well as pedestrian pathways to and along the Bay. Future development of the City's Marina Park property could provide for the existing community center and the City's current sailing and boating facilities on the site to be renovated and expanded.

There are several recreational uses that occur on the project site. The site is used by residents of the City for recreational dance and exercise classes, meetings, training sessions, and general public use.

The project site contains Las Arenas Park, which is classified as a Neighborhood Park, a public beach, and the Balboa Community Center.

**Harbor and Bay Element.** The goals and policies pertaining to harbor issues are intended to guide the content of regulations related to development of and the activities conducted on the water. Additional goals and policies recognize the important component of land use decisions related to waterfront property around Newport Harbor. The aim of the Harbor and Bay Element goals and policies is to preserve the diversity, charm, and character of existing uses that provide support for recreational boaters, visitors, and residents. Goals and policies within the Harbor and Bay Element have been organized to address both water- and land-related issues, provision of public access, provision of waterfront public spaces, and provision of vessel berthing and storage opportunities. Currently, the project site provides limited support for recreational boaters by providing a launch ramp at the end of 18<sup>th</sup> Street as well as the provision of a public beach for visitors and residents.

**Natural Resources Element.** The primary objective of the Natural Resources Element is to provide direction regarding the conservation, development, and utilization of natural resources. It identifies Newport Beach's natural resources and policies for their preservation, development, and wise use. This element addresses water supply (as a resource) and water quality (includes bay and ocean quality as well as potable drinking water), air quality, terrestrial and marine biological resources, open space, archaeological and paleontological resources, mineral resources, visual resources, and energy.

A commitment to sustainable development through the efficient use and conservation of natural resources is important to meet the needs of current and future residents of Newport Beach. Commitment to conservation secures ongoing availability of finite resources such as an ample supply of safe water, diversity of biological resources, and available energy resources. This assurance contributes substantially to the physical and psychological health and well-being of the community and strengthens the vitality of the local and regional economic base.

**Noise Element.** The Noise Element of a General Plan is a tool for including noise control in the planning process in order to maintain compatible land use with environmental noise levels. The Noise Element identifies noise-sensitive land uses and noise sources such as boating and recreational activities and defines areas of noise impact for the purpose of developing policies to insure that Newport Beach residents will be protected from excessive noise intrusion.

The Noise Element follows the revised State Guidelines in Section 46050.1 of the Health and Safety Code. The element quantifies the community noise environment in terms of noise exposure contours for both near and long-term levels of growth and traffic activity. The information contained in this document provides the framework to achieve compatible land uses and provide baseline levels and noise-source identification for local noise-ordinance enforcement.

**Housing Element.** The City has completed a comprehensive General Plan update. The Housing Element has been updated to ensure consistency with the updated Land Use Element and includes

more recent demographic and housing data. The Housing Element covers the Regional Housing Needs Assessment (RHNA) allocation period of January 1998 through June 30, 2008 (extended from June 30, 2005, by the State Department of Housing and Community Development). The Housing Element covers the next RHNA allocation cycle of 2008-2013.

***Local Coastal Program (LCP) Coastal Land Use Plan***

The California Coastal Act (California State Public Resources Code, Division 20, Sections 30000 et seq.) directs each local government lying wholly or partly within the Coastal Zone, as defined by the Coastal Act, to prepare a Local Coastal Program for its portion of the Coastal Zone. More than 63 percent of the City of Newport Beach, including the project site, is located in the Coastal Zone. Local Coastal Programs are used by local governments to carry out the policies and requirements of the Coastal Act. Local Coastal Programs must be reviewed and certified by the California Coastal Commission before being implemented by a local government.

The Local Coastal Program is divided into two components: a coastal land use plan (CLUP) and an Implementation Program. The CLUP provides a technical synopsis of the resources located within the Coastal Zone. The document discusses resources in the context of a coastal zone overview; subarea description and land use plan; shoreline and coastal resource access; public recreational and visitor serving commercial facilities; visual resources; historic and cultural resources; water and marine resources; environmentally sensitive habitat; energy facilities; water, sewer and drainage facilities; and hazards. Issues, goals, objectives, and policies related to each of these areas are also provided. The Implementation Program provides the mechanism to implement each of the identified policies.

The Coastal Commission certified the City's CLUP on February 8, 2006. The next step in the certification process is the completion and adoption of the Implementation Plan. The City is preparing the Implementation Plan in conjunction with a comprehensive update of the Zoning Code.

Since the General Plan was prepared in consideration of the approved CLUP, many of its policies were directly incorporated into the Land Use, Natural Resources, Recreation, and Public Safety Elements. The CLUP organizes the coastal resources planning and management policies under the following chapters: Land Use and Development, Public Access and Recreation, and Coastal Resource Protection. A brief summary of these CLUP components and their relationship to the Marina Park project site follows.

***Chapter 2, Land Use and Development***

Chapter 2 of the CLUP was derived from the Land Use Element of the City's General Plan and is intended to identify the distribution of land uses in the coastal zone. It provides the Land Use Map, coastal development review process, and specific policies by development category.

The Coastal Land Use Plan Map designates the project site as Open Space (OS) which is intended to provide areas for a range of public and private uses to meet the recreation and open-space needs of the community and to protect, maintain, and enhance the community's natural resources.

#### *Chapter 3, Public Access and Recreation*

Chapter 3 of the CLUP addresses policies for shoreline and coastal access, and information and policies related to recreation programs and events. Currently, shoreline and coastal access is provided at 15<sup>th</sup> Street, 18<sup>th</sup> Street, and 19<sup>th</sup> Street. These accesses allow the public direct access to the onsite beach as well as the Newport Bay.

#### *Chapter 4, Coastal Resource Protection*

Chapter 4 of the CLUP addresses biological resources, wetlands and deepwater areas, water quality, scenic and visual resources, and paleontological and cultural resources. The Coastal Act requires that Environmentally Sensitive Habitat Areas (ESHA) be protected against any significant disruption of habitat values. The Coastal Act criteria for determining whether an area qualifies as an ESHA are based on ecological importance, including the rarity or function of the habitat and the habitat's sensitivity.

Section 4.4 of the CLUP includes scenic and visual resources policies, including coastal view protection, bulk and height limitations, natural landform protection, and sign and utility regulations. Where feasible, the scenic and visual qualities of the coastal zone, including public views to and along the ocean, bay, and harbor, are to be protected. Coastal views from designated roadway segments are to be protected pursuant to Policy 4.4.1-6. Relative to the project site, there are currently no views along the primary portion of the project site.

Height limitations and massing are also addressed in Section 4.4.2, Bulk and Height Limitation, of Chapter 4 of the CLUP. Concern over the intensity of development around Lower Newport Bay led to the adoption of a series of ordinances in the early 1970s that established more restrictive height and bulk development standards around the bay. The intent was to regulate the visual and physical mass of structures consistent with the character and visual scale of Newport Beach. As shown in the CLUP (Figure 5.8-1, Height Limitation Zones), the Marina Park site is located within the Shoreline Height Limitation Zone, where new development is limited to a height of 35 feet. Although the height limit is 35 feet, the City may allow new developments with architectural elements to extend beyond the 35 feet limitation.

#### ***City of Newport Beach Municipal Code - Harbor Permit***

The proposed project is subject to the provisions of Title 17 of the Municipal Code pertaining to anchorage and mooring regulations. Specifically, in conformance with Municipal Code Section 17.50.020, the proposed project will require a Harbor Permit in accordance with the provisions of City Council Policy H-1, Harbor and Permit Policy. In addition, per Section 17.50.030 of the Municipal Code, the proposed project will require approval from the U.S. Army Corps of Engineers for proposed work that will occur within the adopted U.S. Bulkhead Line and the U.S. Pierhead Line.

### **City of Newport Beach Zoning Code**

A city or county may exempt itself from the provisions of its own zoning regulations, or it may amend its Zoning Code to include a provision that the regulations shall not apply to capital improvement projects. The Newport Beach Municipal Code does not currently include a provision to exempt capital improvement projects, such as the Marina Park project. Furthermore, the proposed Zoning Code Update that currently is under preparation does not include such a provision for capital improvement projects undertaken in compliance with the City Charter. Therefore, the City, in this particular case, has exempted itself from the provisions of its own zoning regulations.

The proposed project has been presented in a public forum on numerous occasions, including focus group meetings and public outreach with representatives from the community. The design of the proposed project is consistent with the directive of the City Council and the Council-Citizens Committee Marina Park Design Ad Hoc Committee.

The Marina Park is a one-of-a-kind capital improvement project. It is a unique community center/park/beach/marina facility, and in some cases, there are no specific development regulations or standards in the Code that apply to this type of facility. Should the City Council find that this project is not exempt from the zoning and development regulations of the Code, a use permit per the Newport Beach Municipal Code Section 20.65.055 would be required to allow the community and sailing buildings (Balboa Center Complex) to exceed the base height limit at 35-foot high and a modification permit per the Newport Beach Municipal Code Section 20.65.070 to allow architectural features, such as the sail feature on the Balboa Center Complex and the light house tower, to exceed the 35-foot height limit.

### **5.8.3 - Thresholds of Significance**

According to the CEQA Guidelines' Appendix G Environmental Checklist, the following questions are analyzed and evaluated to determine whether land-use and planning impacts are significant environmental effects. Would the project:

- a.) Physically divide an established community?
- b.) Conflict with any applicable land-use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- c.) Conflict with any applicable habitat conservation plan or natural communities conservation plan?

Threshold (C) above is addressed in Section 5.3 (Biological Resources) under impact 5.3-F (Conservation Plans) and is not addressed under this section.

## 5.8.4 - Project Impact Analysis and Mitigation Measures

This section discusses potential impacts associated with the proposed project and provides mitigation measures where necessary.

### Divide Established Community

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**Impact 5.8-A:           The project would not physically divide an established community.**

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#### ***Project-Specific Analysis***

The proposed project will not physically divide an established community. Project implementation will not result in any barriers that would preclude travel throughout the project area. There are residential land uses directly south of West Balboa Boulevard and west of 18th Street. The proposed project will significantly enhance horizontal and lateral public access to the beach. Therefore, no impact related to this issue will result from implementation of the proposed project.

#### ***Cumulative***

As described above, the proposed project will not physically divide an established community. Therefore, the proposed project would not contribute to potential cumulative effects related to dividing an established community.

#### ***Mitigation Measures***

##### *Project Specific*

No mitigation measures are required.

##### *Cumulative*

No mitigation measures required.

#### ***Level of Significance After Mitigation***

##### *Project Specific*

No impact.

##### *Cumulative*

No impact.

### Conflict with Applicable Plans, Policies, or Regulations

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**Impact 5.8-B:           The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.**

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#### ***Project-Specific Analysis***

The City of Newport Beach General Plan sets forth goals and policies and the City's Local Coastal Program sets forth policies that serve to guide land use planning efforts in the City of Newport Beach. Table 5.8-1 provides an analysis of the project's consistency with the applicable goals and policies.

As described in Table 5.8-1, the proposed project is consistent with the applicable goals and policies of the City's General Plan and Local Coastal Program.

**Table 5.8-1: Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
General Plan	
Land Use Element	
<p>Goal LU 1 - A unique residential community with diverse coastal upland neighborhoods, which values its colorful past, high quality of life, and community bonds and balances the needs of residents, businesses, and visitors through the recognition that Newport Beach is primarily a residential community.</p>	<p>The development concept for the project combines a mixture of uses--public facilities and recreation -- to maintain and define the character of Newport Beach. In addition, the project would rely on the Balboa Center Complex as a focal point for resident and visitor uses. The Balboa Center Complex would help to maintain the heart of Newport Bay while providing convenient recreational opportunities to accommodate the needs of the City’s residents. The project would be consistent with this goal.</p>
<p>Policy LU 1.1 - Unique Environment Maintain and enhance the beneficial and unique character of the different neighborhoods, business districts, and harbor that together identify Newport Beach. Locate and design development to reflect Newport Beach’s topography, architectural diversity, and view sheds.</p>	<p>As described in Section 5.1, the proposed park would enhance views of Newport Bay from Balboa Boulevard, increasing the visual character of the site. The project would be consistent with this policy.</p>
<p>Policy LU 1.3 - Natural Resources Protect the natural setting that contributes to the character and identity of Newport Beach and the sense of place it provides for its residents and visitors. Preserve open-space resources, beaches, harbor, parks, bluffs, preserves, and estuaries as visual, recreational, and habitat resources.</p>	<p>Land uses proposed by the project would accommodate a distinct character, style, and density of development within the City. In addition, the project’s land-use designation is intended to accommodate a broad range of recreation facilities with the intent to appeal to local residents as well as visitors of Newport Beach. The proposed park would contribute to the character identity of Newport Beach by enhancing views to the Bay as shown in Exhibits 5.1-3 and 5.1-4 in Section 5.1, Aesthetics. The project would be consistent with this policy.</p>
<p>Policy LU 1.6 - Public Views Protect and, where feasible, enhance significant scenic and visual resources that include open space, mountains, canyons, ridges, ocean, and harbor from public vantage points.</p>	<p>The proposed park would enhance as shown in Exhibits 5.1-3 and 5.1-4 in Section 5.1 views of Newport Bay from Balboa Boulevard, increasing the visual character of the site. The project would be consistent with this policy.</p>
<p>Goal LU 2 - A living, active, and diverse environment that complements all lifestyles and enhances neighborhoods, without compromising the valued resources that make Newport Beach unique. It contains a diversity of uses that support the needs of residents, sustain and enhance the economy, provide job opportunities, serve visitors that enjoy the City’s diverse recreational amenities, and protect its important environmental setting, resources, and quality of life.</p>	<p>The proposed would define Balboa Peninsula as a recreational focal point in the community through the provision of park facilities and the expansion of public facilities such as the proposed multi-purpose building and sailing program building as well as the proposed visiting vessel marina as described in Section 3.2, Project Characteristics. The project would be consistent with this goal.</p>

**Table 5.8-1 (Cont.): Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
General Plan	
<p>Policy LU 2.5 - Harbor and Waterfront Uses Preserve the uses of the Harbor and the waterfront that contribute to the charm and character of Newport Beach and provide needed support for recreational and commercial boaters, visitors, and residents, with appropriate regulations necessary to protect the interests of all users as well as adjoining residents.</p>	<p>The project would supply needed support for recreational boaters, visitors, and residents by providing sailing programs and accommodate short-term visiting vessels for up to 30 days. Therefore, the project would be consistent with this policy.</p>
<p>Policy LU 2.6 – Visitor-Serving Uses Provide uses that serve visitors to Newport Beach’s ocean, harbor, open spaces, and other recreational assets, while integrating them to protect neighborhoods and residents.</p>	<p>The primary purpose of the project is to serve the residents of Balboa Peninsula and the City. However, the project would also serve visitors of Newport Beach by offering a variety of recreational opportunities including a public park and beach, and short-term visiting-vessel marina. The project would be consistent with this policy.</p>
<p>Policy LU 3.2 - Growth and Change Enhance existing neighborhoods, districts, and corridors, allowing for reuse and infill with uses that are complementary in type, form, scale, and character. Changes in use and/or density/intensity should be considered only in those areas that are economically underperforming, if they are necessary to accommodate Newport Beach’s share of projected regional population growth, if they improve the relationship and reduce commuting distance between home and jobs, or if they enhance the values that distinguish Newport Beach as a special place to live for its residents. The scale of growth and new development shall be coordinated with the provision of adequate infrastructure and public services, including standards for acceptable traffic level of service.</p>	<p>The proposed project would enhance the existing neighborhood by providing needed recreational uses on Balboa Peninsula. The proposed uses could increase traffic in the area however, the level of service would remain acceptable as described in Section 5.11, Transportation and Traffic. Existing public services to the site would be adequate to serve the proposed project. However, if the City determines that the existing 16-inch water line that extends east to west through the project site is too old or too shallow for use after exposing the water line, the line may need replacement as described in Section 5.12, Utilities and Service Systems. The project would be consistent with this policy.</p>
<p>Policy LU 3.3 - Opportunities for Change Provide opportunities for improved development and enhanced environments for residents in the following districts and corridors, as specified in Policies 6.3.1 through 6.22.7:</p> <ul style="list-style-type: none"> <li>• Balboa Peninsula: more efficient patterns of use that consolidate the Peninsula’s visitor-serving and mixed uses within the core commercial districts; encourage marine -</li> </ul>	<p>The proposed project would provide marine uses along the Bay front, such as slips for visiting boaters, and sailing programs As described in Section 3.2, Project Characteristics. Therefore, the project would be consistent with this policy.</p>

**Table 5.8-1 (Cont.): Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
<b>General Plan</b>	
<p>related uses especially along the bay front; integrate residential with retail and visitor-serving uses in Lido Village, McFadden Square, Balboa Village, and along portions of the Harbor frontage; re-use interior parcels in Cannery Village for residential and limited mixed-use and live/work buildings; and redevelop underperforming properties outside of the core commercial districts along the Balboa Boulevard corridor for residential. Infill development shall be designed and sited to preserve the historical and architectural fabric of these districts.</p>	
<p>Policy LU 3.6 - Waterfront Access Use public beaches for public recreational uses and prohibit uses that interfere with public access and enjoyment of coastal resources. Encourage the expansion and improvement of access to the waterfront and water uses that provide important links to waterfront uses such as beaches, launching facilities, public docks, and other similar public-water-area uses.</p>	<p>The project includes an enhancement of the existing park uses and beach for recreational use. The project increases access to the beach and increases recreational amenities by providing areas for sailing classes and community events as described in Section 3.2, Project Characteristics, and Section 5.1, Aesthetics. In addition, a public short-term marina will accommodate vessels for up to 30 days to encourage water-area uses. The project would be consistent with this policy.</p>
<p>Policy LU 5.6.1 - Compatible Development Require that buildings and properties be designed to ensure compatibility within and as interfaces between neighborhoods, districts, and corridors.</p>	<p>The proposed project would result in a substantial enhancement of views from Balboa Boulevard to Newport Bay as described and illustrated in Section 5.1, Aesthetics. Overall, the project would be compatible with the adjacent land uses. Therefore, the project would be consistent with this policy.</p>
<p>Policy LU 5.6.2 - Form and Environment Require that new and renovated buildings be designed to avoid the use of styles, colors, and materials that unusually impact the design character and quality of their locations such as abrupt changes in scale, building form, and architectural style and the use of surface materials that raise local temperatures, result in glare and excessive illumination of adjoining properties and open spaces, or adversely modify wind patterns.</p>	<p>The proposed project includes the use of a marine motif (i.e., lighthouse tower and a roof that resembles a sail feature) as described in Section 3.2. Although the architectural features would exceed the City’s height requirement, the proposed architectural features would be compatible with the surrounding uses as described in Section 5.1, Aesthetics. The project would be consistent with this policy.</p>

**Table 5.8-1 (Cont.): Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
<b>General Plan</b>	
<p>Policy LU 5.6.3 - Ambient Lighting Require that outdoor lighting be located and designed to prevent spillover onto adjoining properties or significantly increase the overall ambient illumination of their location.</p>	<p>The project would introduce additional lighting on the site, but this additional lighting would be low level safety lighting as well as a light feature on top of the proposed lighthouse tower. It is not intended to provide external illumination, but instead, to function as a marker highlighting the uppermost portion of the tower. The fixture will avoid emitting direct rays in any one direction and to minimize glare. Therefore, the proposed project would be consistent with this policy.</p>
<p>Policy LU 5.6.4 - Conformance with the Natural Environmental Setting Require that sites be planned and buildings designed in consideration of the property’s topography, landforms, drainage patterns, natural vegetation, and relationship to the bay and coastline, maintaining the environmental character that distinguishes Newport Beach.</p>	<p>The proposed project is planned to preserve environmentally sensitive coastal areas along Newport Bay by providing an increase in subtidal habitat as described in Section 5.3, Biological Resources. The proposed development will ensure the protection of the coastal zone while providing recreational uses. The proposed project would maintain the environmental character of Newport Beach by providing marine uses that are compatible with the existing marine environment. Therefore, the project would be consistent with this policy.</p>
<p>Goal LU 6.1 - A diversity of governmental service, institutional, educational, cultural, social, religious, and medical facilities that are available for and enhance the quality of life for residents and are located and designed to complement Newport Beach’s neighborhoods.</p>	<p>The project provides a “Window on the Bay” from Balboa Boulevard as illustrated in Section 5.1, Aesthetics and will offer a variety of facilities to enhance the quality of life for residents within the City of Newport Beach such as educational classes within the multipurpose building, sailing programs in the sailing program building, and a park that provides public views to Newport Bay. The project is consistent with this goal.</p>
<p>Policy LU 6.1.2 - Siting of New Development Allow for the development of new public and institutional facilities within the City provided that the use and development facilities are compatible with adjoining land uses, are environmentally suitable, and can be supported by transportation and utility infrastructure.</p>	<p>The project will provide a public park and beach. In addition, the Balboa Center Complex will provide rooms for educational classes and community events. Project uses will be consistent with adjoining land uses, including the American Legion Post 291 marina. These uses are described in Section 3.2, Project Characteristics. The project is consistent with this policy.</p>
<p>Goal LU 6.8 - A series of commercial, visitor-serving, marine-related, civic, and residential neighborhoods that are vibrant throughout the year, differentiated by their historic and functional characteristics and architectural style, yet integrated by streetscape amenities.</p>	<p>The project will create within Newport Bay a series of visitor-serving and marine-related services, including a visiting-vessel marina as described in Section 3.2, Project Characteristics. The project is consistent with this goal.</p>
<p><b>Recreation Element</b></p>	

**Table 5.8-1 (Cont.): Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
General Plan	
<p>Goal R1 - Provision of Facilities Provision of adequate park and recreation facilities that meet the recreational needs of existing and new residents of the community.</p>	<p>Implementation of the proposed project would include removal of existing community facilities, including the Balboa Community Center, the Neva B. Thomas Girl Scout House, a children’s play area, four tennis courts, and one half court basketball court. The project includes the replacement of these facilities with the Balboa Center Complex, which will include a multi-purpose building and sailing program building. The project will also include a public beach and park with a children’s play area and basketball courts. In addition, two tennis courts are proposed on the eastern portion of the site adjacent to 15th Street. The Neva B. Thomas Girl Scout House will be relocated to another area on site. On balance, replacement of deteriorated existing recreational facilities with new facilities is determined to be consistent with the intent of Goal R1.</p>
<p>Policy R1.9 - Priority for Facility Provision Provide additional park and recreation facilities that meet the needs as identified by direct feedback from residents, through analysis of future trends, and through observations by Recreation and Senior Services staff.</p>	<p>The project includes the development of the Marina Park site with marine-related recreational facilities for both visitors and residents of Newport Beach as described in Section 3.2, Project Characteristics. The project is consistent with this policy.</p>
<p>Policy R 2.3 - Preservation of Public Beaches Preserve all public beaches for public-only purposes.</p>	<p>As described in Section 3.2, Project Characteristics, the project includes the retention of the beach within the project area, except for the portion of the beach that would be removed for the proposed marina; Overall, the project would be consistent with this policy.</p>
<p>Goal R 3 - Accessibility of Facilities Accessible parks and recreation facilities to persons with disabilities.</p>	<p>The proposed facilities would include features to provide access for persons with disabilities. Therefore, the project would be consistent with this goal.</p>
<p>Goal R 4 - Provision of Recreation Programs Provision of a variety of seasonal and year-round recreational programs designed to meet the needs of all residents, including children, seniors, and persons with special needs.</p>	<p>As described in Section 3.2, Project Characteristics, the project includes a multipurpose building and sailing program building that would have rooms for educational classes and community events and would be open to the public. These facilities would provide a variety of programs to meet the needs of the community. The project would be consistent with this goal.</p>
<p>Policy R 4.2 - Compatible Recreation Activities Provide a variety of compatible recreational activities within a given location.</p>	<p>The project includes a variety of marine-related activities compatible with the site, including sailing classes. In addition, the project site would contain a children’s play area, tennis courts, and a basketball court for recreational use. These uses are similar to those that are currently on the project site; however, there would be a substantial increase in the provision of recreational activities on the project site. As described in Section 5.2, Air Quality, Section 5.9, Noise, and Section 5.11, Transportation and Traffic, the proposed recreational uses would be compatible with the surrounding land uses. The project would be consistent with this policy.</p>

**Table 5.8-1 (Cont.): Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
<b>General Plan</b>	
<p>Goal R 6 - Provision of Coastal Recreational Opportunities Protection and enhancement of a wide-range of recreational opportunities along the coast and beaches.</p>	<p>As described in Section 3.2, Project Characteristics, the project includes a variety of marine-related activities that would enhance the coastal area throughout Newport Bay. The project would be consistent with this goal.</p>
<p>Goal R 7 - Provision of Adequate Support Facilities Adequate support facilities serving recreational opportunities within the coastal zone.</p>	<p>Utility hook-ups are proposed to be available for the marina, while bathrooms and laundry areas are proposed adjacent to the marina. An existing bathroom on the public beach adjacent to 19th Street is proposed to be reconstructed, but the size of the bathroom facility would remain the same. As described in Section 5.12, the existing facilities are adequate to serve the proposed project. In the event that the existing water main that traverses the site may be too old, the City would replace it as identified in Mitigation Measure MM 5.12-B.1 in Section 5.12.4. The project would be consistent with this goal.</p>
<p>Policy R 8.2 - Provision of New Facilities Provide additional marine recreational, educational, and support facilities and opportunities as feasible.</p>	<p>As described in Section 3.2, Project Characteristics, the proposed project will provide additional marine recreational facilities, including a public short-term visiting-vessel marina, and the Balboa Center Complex. These facilities would provide recreational opportunities, including marina rental. The project would be consistent with this policy.</p>
<p>Policy R 8.5 - Support Facilities Protect and, where feasible, expand and enhance:</p> <ul style="list-style-type: none"> <li>• Waste pump-out stations</li> <li>• Vessel-launching facilities, including nonmotorized sail boat launch facilities in Lower Newport Bay</li> <li>• Low-cost public launching facilities</li> <li>• Marinas and dry boat-storage facilities</li> <li>• Guest docks at public facilities; yacht clubs; and privately owned-marinas, restaurants, and other appropriate locations</li> <li>• Facilities and services for visiting vessels</li> <li>• Facilities necessary to support vessels berthed or moored in the harbor, such as boat haul-out facilities</li> <li>• Existing harbor support uses serving the needs of existing waterfront uses, recreational boaters, the boating community, and visiting vessels.</li> </ul>	<p>As described in Section 3.2, Project Characteristics, the project will enhance guest and public facilities, which will include, but are not limited to, a waste pump-out station; a short-term visiting-vessel marina; utility hook-ups for the marina; and the Balboa Center Complex, including a cafe. The project would be consistent with this policy.</p>

**Table 5.8-1 (Cont.): Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
<b>General Plan</b>	
<p>Policy R 8.7 - Marine Recreational Programs Protect and enhance specific programs that utilize the harbor, bay, and ocean such as the City’s sailing program and junior lifeguard program.</p>	<p>As described in Section 3.2, Project Characteristics, the proposed sailing center will include areas for sailing classes to enhance the City’s sailing program. The project would be consistent with this policy.</p>
<p>Goal R 9 - Provision of Public Access Provision and maintenance of public access for recreational purposes to the City’s coastal resources.</p>	<p>As described in Section 5.11, Transportation and Traffic, primary access to the project will be via West Balboa Boulevard at 16th Street, and secondary access will be via a controlled exit/entrance off of 15th Street. Public access to the beach will be provided by walkways within the proposed park as well as an access provided along the western side of the proposed marina. Furthermore, 18th and 19th Streets will still provide access to the public beach. The project would be consistent with this goal.</p>
<b>Harbor and Bay Element</b>	
<p>Goal HB 1 - Preservation of the diverse uses of the harbor and the waterfront that contribute to the charm and character of Newport Bay and that provide needed support for recreational boaters, visitors, and residents.</p>	<p>The project will expand the existing Community Center facilities and proposes a public park and beach. The site will preserve and maintain its current public service and recreation designation. The project will contribute to the unique character of Newport Bay through the provision of the proposed marina, providing greater access to the bay, and retention of the beach as described in Section 3.2, Project Characteristics. The project will also provide recreational opportunities and support facilities for the community and for visitors. The project would be consistent with this goal.</p>
<p>Policy HB 1.1 - Preservation and Enhancement of Water-Dependent and Related Uses</p> <p>Preserve and enhance the following uses that contribute to the diversity and charm of Newport Bay and maintain the balance among them:</p> <ul style="list-style-type: none"> <li>• Water-dependent and water-related recreational activities such as boating, sailing, wind surfing, fishing, kayaking, rowing, paddle barding, and swimming</li> <li>• Water-dependent and water-related commercial activities such as passenger/sightseeing boats, passenger-fishing boats, boat rentals and sales, entertainment boats, boat/ship repair and maintenance, and harbor maintenance facilities</li> <li>• Water-enhanced commercial uses such as restaurants and retail stores</li> </ul>	<p>The project will enhance guest and public facilities, which include, but are not limited to: a waste pump-out station, a short-term visiting-vessel marina, utility hook-ups for the marina, and the Balboa Center Complex, including a cafe. These facilities are described in Section 3.2, Project Characteristics. The project would be consistent with this policy.</p>

**Table 5.8-1 (Cont.): Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
<b>General Plan</b>	
<ul style="list-style-type: none"> <li>• Water-related public recreation and education areas and facilities such as beaches, piers, view parks and nautical museums, and related public areas providing access to and views of Newport Harbor.</li> <li>• Coastal residential communities.</li> </ul>	
<p>Policy HB 1.2 - Waterfront Public Spaces Encourage the creation of waterfront public spaces and beaches, with adjacent water access and docking facilities that serve the identity and activity “centers” of Newport Harbor for special events of community /regional interest.</p>	<p>The project proposes a public beach and waterfront public spaces, including a visiting-vessel marina. With the provision of these waterfront public spaces, the project would be consistent with this policy.</p>
<p>Goal HB 5 - A variety of vessel berthing and storage opportunities.</p>	<p>The project includes a marina for visiting vessels up to 30 days. Currently, the City has five visiting vessel (up to 30 days) slips. The project would add to the City’s existing inventory. Therefore, the project would be consistent with this goal.</p>
<p>Policy HB 6 - Provision and maintenance of public access to the City’s coastal resources for recreational purposes.</p>	<p>Primary access to the project will be via West Balboa Boulevard at 16th Street, and secondary access will be via a controlled exit/entrance off of 15th Street. Public access to the beach will be provided by walkways within the proposed park as well as an access provided along the western side of the proposed marina. Furthermore, 18th and 19th Streets will continue to provide access to the public beach. With the provision of various accesses to the bay, the project would be consistent with this policy.</p>
<b>Noise Element</b>	
<p>Policy N 1.8 – Require the employment of noise mitigation measures for existing sensitive uses when a significant noise impact is identified. A significant noise impact occurs when there is an increase in the ambient CNEL produced by new development impacting existing sensitive uses. The CNEL significance increase is shown below:</p> <ul style="list-style-type: none"> <li>A. A CNEL of 55 dBA increasing 3 dBA</li> <li>B. A CNEL of 60 dBA increasing 2 dBA</li> <li>C. A CNEL of 65 dBA increasing 1 dBA</li> <li>D. A CNEL of 70 dBA increasing 1 dBA</li> <li>E. Over 75, an increase in dBA is considered significant</li> </ul>	<p>According to the Noise Information provided in Appendix I and Section 5.9, the proposed project will not result in any significant noise impacts or increases in CNEL dBA. Therefore, the proposed project will be consistent with this policy.</p>

**Table 5.8-1 (Cont.): Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
<b>General Plan</b>	
Policy N 2.5 – Enforce compliance of all boating activities with the noise standards defined in the Municipal Code.	The proposed project includes a marina that will accommodate visiting vessels. Similar to Newport Bay, the marina basin will be a no wake zone. This zone prevents boaters from speeding into the marina as well as reduces boat engine noise levels. The harbor patrol regulates activities of boats and vessels as well as noise levels. The proposed project is considered to be consistent with this policy.
Policy N 4.4 – Limit hours when recreational activities in parks and the harbor can take place.	The proposed project will provide residents and visitors with recreational uses such as the proposed park. The park will close to the public at 10:00 P.M. daily, although other uses on site may close earlier. Therefore, the proposed project will be consistent with this policy.
Policy N 4.6 – Enforce the Noise Ordinance noise limits on hours of maintenance or construction activity in or adjacent to residential areas, including noise that results from in-home hobby or work related activities.	Construction activities for the proposed project will adhere to the City Municipal Code and no operations will take place outside of the designated hours of construction. Therefore, the proposed project will be consistent with this policy.
<b>Housing Element</b>	
Policy H.2.1 - Encourage preservation of existing and provision of new housing affordable to very low, low- and moderate income households.	The existing mobile home park is located on parks and recreation designated land owned by the City. Due to the non-conforming use of the mobile homes, the City does not account for the mobile homes as affordable housing within the City’s Housing Element. Therefore, this policy is not applicable to the proposed project.
<b>Natural Resources Element</b>	
Goal NR 3 - Enhancement and protection of water quality of all natural water bodies, including coastal waters, creeks, bays, harbors, and wetlands.	The proposed project includes the development of a visiting vessel marina. The marina could result in a long-term impact on water quality; however, Mitigation Measure MM 5.7-A.2 in Section 5.7, Hydrology and Water Quality, would reduce this potential impact to less than significant. Therefore, after mitigation, the project would be consistent with this goal.
Goal NR 11 - Protection of environmental resources in Newport Harbor while preserving and enhancing public recreational boating activities.	The proposed project includes the development of a marina for short-term visiting vessels. The development of the project would not result in any long-term impacts to environmental resources after implementation of the recommended mitigation for long-term water quality (see Mitigation Measure MM 5.7-A2 in Section 5.7, Hydrology and Water Quality). Therefore, the proposed project would be consistent with this goal.

**Table 5.8-1 (Cont.): Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
General Plan	
<b>Safety Element</b>	
<p>Goal S 1 – Protection of people and property from the adverse effects of coastal hazards related to tsunamis and rogue waves.</p>	<p>As designed, the floors of the proposed structures on site are at +10 feet above the mean low low water (MLLW) level. The seawalls throughout the bay are typically constructed at elevation +9 MLLW. The construction of the proposed project structures at +10 MLLW would result in less than significant impacts from the bay water such as flooding and storm surges. Therefore, the project is consistent with this goal.</p>
<p>Policy S 2.1 – Maintain beach width, critical protection against tsunami run-up for structures along the oceanfront, through such projects as the Surfside-Sunset/West Newport Beach Replenishment Program.</p>	<p>The proposed project has planned dredging efforts that will lead to the exporting of soils offsite. Furthermore, soils dredged from the site will be utilized in increasing sand beach in one portion of the project site and also used to replenish beaches on the oceanfront through disposal of the soil into the surf to allow the sand to be moved to the beachfront through natural currents. Therefore, the proposed project would be consistent with this policy.</p>
<b>Circulation</b>	
<p>Policy CE 2.1.1 – Plan the arterial roadway system to accommodate projected traffic at the following level of service standards:</p> <ul style="list-style-type: none"> <li>• Level of Service (LOS) “D” throughout the City, unless otherwise noted</li> </ul>	<p>The traffic study completed by Austin-Foust Associates, Inc. (Appendix K) and Section 5.11 display the projected Level of Service after the proposed project has been built. No roadways or intersections will fall below a LOS D after the project has been implemented. Therefore, the proposed project is consistent with this policy.</p>
<p>Policy CE 7.1.1 – Require that new development provide adequate, convenient parking for residents, guests, business patrons, and visitors.</p>	<p>The traffic study completed by Austin-Foust Associates, Inc. (Appendix K) and Section 5.11 discuss the need to provide 144 parking spaces to adequately accommodate the proposed uses. Based on the provision of 153 parking spaces as identified in Section 3.2, Project Characteristics, adequate parking will be provided for the proposed onsite uses. Therefore, the proposed project is consistent with this policy.</p>
<p>Policy CE 7.2.1 – Develop parking management programs for areas with inadequate parking.</p>	<p>During the summer months, the Balboa Peninsula in the City of Newport Beach experiences inadequate parking due to the high volume of visitors and tourists. The project includes the implementation of a Parking Management Plan to ensure that adequate parking would be available for the proposed onsite uses. Therefore, the proposed project is consistent with this policy.</p>

**Table 5.8-1 (Cont.): Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
<b>Local Coastal Program</b>	
<b>Public Access</b>	
<p>All existing vista points on public property shall be protected and maintained.</p> <p>Public access in coastal areas shall be maximized consistent with the protection of natural resources, public safety, and private property rights.</p> <p>Lateral access shall be provided in new development by means of dedication of easements for public access along the beach and shoreline except where adequate access already exists or where the provision of access is inconsistent with public safety or the protection of fragile coastal resources.</p>	<p>As described in Section 3.2, Project Characteristics, primary access to the project will be via West Balboa Boulevard at 16th Street, and secondary access will be via 15th Street. Public access to the beach will be provided by walkways within the proposed park as well as an access provided along the western side of the proposed marina. Furthermore, 18th and 19th Streets will continue to provide access to the public beach. Accordingly, the project is considered to be consistent with the public access policies.</p>
<b>Circulation</b>	
<p>All development shall provide adequate off-street parking to meet the requirements of the Newport Beach Zoning Code.</p> <p>The City shall require new development in the Coastal Zone to make parking provided by the project available to the public when hours of operation of the proposed uses allow such joint usage and when the project is in proximity to coastal resources.</p> <p>Commercial, recreation or destination visitor-serving facilities in and around the harbor shall be controlled and regulated to minimize traffic congestion and parking shortages in order to ensure access to the water for residents and visitors.</p>	<p>The traffic study completed by Austin-Foust Associates, Inc. (Appendix K) and Section 5.11 discuss the need to provide 144 parking spaces to adequately accommodate the proposed uses. Based on the provision of 153 parking spaces as identified in Section 3.2, Project Characteristics, adequate parking will be provided for the proposed onsite uses. Therefore, the proposed project is consistent with these off-street parking policies.</p>
<b>Dredging, Diking, and Filling</b>	
<p>New development on the waterfront shall take into consideration existing usable water areas for docking facilities.</p>	<p>The proposed project includes a public short-term visiting-vessel marina to accommodate visiting vessels for up to 30 days. The proposed marina would not result in adverse impacts to existing docking facilities. The project’s proposed marina would provide a beneficial impact on docking facilities within Newport Harbor through the provision of 23 slips. As a result, the project is considered consistent with this policy.</p>

**Table 5.8-1 (Cont.): Consistency of Marina Park Project With General Plan and Local Coastal Program Goals and Policies**

General Plan and Local Coastal Program Goals and Policies	Project Consistency Analysis
<b>Local Coastal Program</b>	
<b>Archaeological, Paleontological, and Historical Resources</b>	
<p>Prior to any development, archaeological, paleontological, and historical resources shall be mapped and evaluated by a qualified professional.</p>	<p>As described in Section 5.4, Cultural Resources, a cultural records search and a review of the City’s Historic Inventory has been completed, and there are no known resources on the project site. Due to the cultural sensitivity of the project area, Mitigation Measures MM 5.4-B.1, MM 5.4-B.2, MM 5.4-C.1, and MM 5.4-D.1 would result potential impacts to unknown cultural resources to less than significant. With the implementation of these mitigation measures, the proposed project would be consistent with this policy.</p>
<b>Coastal Views</b>	
<p>Where coastal views from existing roadways exist, any development on private property within the sight lines from the roadway shall be sited and designed to maximize protection of the coastal view. Marina Park is designated as a Coastal View Area.</p>	<p>As described in Section 5.1, Aesthetics, the proposed project includes a substantial view area of the bay from Balboa Boulevard. Currently, minimal coastal views are provided along existing streets that are perpendicular to the bay. With the implementation of the proposed project, open views from Balboa Boulevard will be provided. Therefore, the proposed project would be consistent with this policy.</p>
<b>Visitor-Serving Facilities</b>	
<p>Consistent with all other policies to protect and enhance the quality residential character of the community, the City shall encourage and protect both public and private water-oriented recreational and entertainment facilities as a means of providing public access to the waterfront.</p> <p>Provision and maintenance of public restrooms is a top priority. A permanent restroom facility shall be constructed at Las Arenas Park.</p>	<p>The provision of the proposed project will provide a nautical motif which is consistent with other areas within Newport Bay. This nautical design would protect the existing residential beach character of the surrounding community. In addition, the project will enhance the availability of public water-oriented recreational and entertainment facilities that are accessible by the public. Therefore, the proposed project would be consistent with Policy VSF-3.</p> <p>Furthermore, the proposed project includes a public restroom and includes the replacement of the existing bathroom on the public beach adjacent to 19th Street. The provision of these bathroom improvements would be consistent with Policy VSF-4(c).</p>

**Cumulative**

As described above, the proposed project is compatible with the surrounding land uses and is consistent with the City of Newport Beach General Plan and Local Coastal Program goals and policies. Therefore, the proposed project would not contribute to potential cumulative land use compatibility effects or policy inconsistencies that may occur with related projects.

**Mitigation Measures**

*Project Specific*

No mitigation measures are required.

*Cumulative*

No mitigation measures are required.

**Level of Significance After Mitigation**

*Project Specific*

No impact.

*Cumulative*

No impact.